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6 *Special Insurance Counsel to*  
7 *The Official Committee of Unsecured Creditors*

8 **UNITED STATES BANKRUPTCY COURT**  
9 **NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

10 In re

11 THE ROMAN CATHOLIC ARCHBISHOP  
12 OF SAN FRANCISCO,

13 Debtor and Debtor in Possession.

Case No. 23-30564

Chapter 11

**MONTHLY PROFESSIONAL FEE**  
**STATEMENT FOR BURNS BAIR LLP**  
**FOR JANUARY 2024**

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15 **TO ALL INTERESTED PARTIES AND TO THEIR COUNSEL OF RECORD:**

16 **NOTICE IS HEREBY GIVEN** that Burns Bair LLP, special insurance counsel to the  
17 Official Committee of Unsecured Creditors (the “Committee”), hereby files its monthly professional  
18 fee statement for the period January 1, 2024 through January 31, 2024 (the “Fee Period”), pursuant  
19 to the *Order Establishing Procedures and Authorizing Payment of Professional Fees and Expenses*  
20 *on a Monthly Basis* (the “Compensation Order”), entered on October 16, 2023 [ECF No. 212]. The  
21 total fees and expenses incurred by Burns Bair LLP on behalf of the Committee for the Fee Period  
22 are as follows:

23

| Period  | Fees                     | Expenses | Total       |
|---|--------------------------|----------|-------------|
| January 1, 2024 – January 31, 2024  | \$10,808.00 <sup>1</sup> | \$49.30  | \$10,857.30 |
| Net Total Allowed Payments this Statement Period (80% of fees and 100% of expenses) | \$8,646.40               | \$49.30  | \$8,695.70  |

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27 <sup>1</sup> Burns Bair will contribute ten percent of all fees it receives in this case on a final basis to a settlement trust that is  
28 approved as part of a plan of reorganization. As such fees are paid, Burns Bair will hold those funds in a trust account  
until a settlement trust is established through a plan of reorganization.

1 Attached hereto at **Exhibit 1** is Burns Bair's itemized billing statement for its fees and  
2 expenses billed during the Fee Period. Pursuant to the Compensation Order, the Net Total Allowed  
3 Payments detailed in the chart above shall be paid from funds held by the estate of the Debtor, The  
4 Roman Catholic Archbishop of San Francisco, unless an objection is filed with the Clerk of the  
5 Court and served upon Burns Bair LLP within *14 days after the date of service* of this monthly  
6 professional fee statement.

7 Dated: February 15, 2024

**BURNS BAIR LLP**

8  
9 By: /s/ Jesse J. Bair  
Jesse J. Bair

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11 *Special Insurance Counsel to the Official*  
12 *Committee of Unsecured Creditors*  
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# EXHIBIT 1

# Burns | Bair

10 E. Doty St., Suite 600  
Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**Official Committee of Unsecured Creditors of  
Archbishop of San Francisco**

**Issue Date :** 2/5/2024

**Bill # :** 01367

**Matter:** Insurance

## PROFESSIONAL SERVICES RENDERED

### Committee Meetings

| <u>Date</u>                          | <u>Timekeeper</u> | <u>Narrative</u>  | <u>Hours</u> | <u>Amount</u>     |
|--------------------------------------|-------------------|---|--------------|-------------------|
| 1/10/2024                            | Jesse Bair        | Review B. Michael correspondence re agenda for upcoming Committee meeting and case developments (.1); | 0.10         | \$90.00           |
| 1/19/2024                            | Jesse Bair        | Prepare for state court counsel meeting re potential case insurance strategies (.1);                  | 0.10         | \$90.00           |
| 1/19/2024                            | Jesse Bair        | Participate in state court counsel meeting re potential case insurance strategies (1.2);              | 1.20         | \$1,080.00        |
| <b>Totals for Committee Meetings</b> |                   |   | <b>1.40</b>  | <b>\$1,260.00</b> |

### Fee Applications

| <u>Date</u>                        | <u>Timekeeper</u>   | <u>Narrative</u>  | <u>Hours</u> | <u>Amount</u>     |
|------------------------------------|---------------------|---|--------------|-------------------|
| 1/9/2024                           | Jesse Bair          | Review and edit Burns Bair invoice for inclusion with monthly fee submission (1.0); correspondence with B. Horn re same (.1); | 1.10         | \$990.00          |
| 1/10/2024                          | Jesse Bair          | Correspondence with the Committee re Burns Bair's monthly fee submission (.1);  | 0.10         | \$90.00           |
| 1/14/2024                          | Jesse Bair          | Correspondence with G. Brown re first round of interim fee applications (.1);   | 0.10         | \$90.00           |
| 1/16/2024                          | Jesse Bair          | Correspondence with G. Brown and BRG re first round of interim fee applications (.1);   | 0.10         | \$90.00           |
| 1/16/2024                          | Brenda Horn-Edwards | Draft monthly Burns Bair professional fee statement (.3); correspond with J. Bair re same (.1);                               | 0.40         | \$136.00          |
| 1/18/2024                          | Jesse Bair          | Review and edit Burns Bair monthly fee submission (.1); review and respond to correspondence with PSZJ re same (.2);          | 0.30         | \$270.00          |
| 1/19/2024                          | Timothy Burns       | Review fee examiner order (.1);   | 0.10         | \$112.00          |
| <b>Totals for Fee Applications</b> |                     |   | <b>2.20</b>  | <b>\$1,778.00</b> |

**Insurance Recovery Activities**

| <b><u>Date</u></b> | <b><u>Timekeeper</u></b> | <b><u>Narrative</u></b>   | <b><u>Hours</u></b> | <b><u>Amount</u></b> |
|--------------------|--------------------------|---|---------------------|----------------------|
| 1/2/2024           | Jesse Bair               | Review J. Stang correspondence re potential mediators and debtor position re same (.1);   | 0.10                | \$90.00              |
| 1/2/2024           | Jesse Bair               | Participate in call with J. Stang and T. Burns re potential test case strategy (.3);  | 0.30                | \$270.00             |
| 1/2/2024           | Timothy Burns            | Participate in call with J. Stang and J. Bair re potential test case strategy (.3);   | 0.30                | \$336.00             |
| 1/3/2024           | Jesse Bair               | Review third notice of continuance of certain insurers' motion to lift the stay (.1);   | 0.10                | \$90.00              |
| 1/4/2024           | Jesse Bair               | Brief analysis of insurance issues in connection with potential test case strategy (.1);  | 0.10                | \$90.00              |
| 1/4/2024           | Timothy Burns            | Participate in additional call with J. Stang re insurance case strategy (.3); brief analysis re status of underlying lawsuits prior to bankruptcy in connection with potential test cases (.1); | 0.40                | \$448.00             |
| 1/4/2024           | Jesse Bair               | Review correspondence with the Debtor and PSZJ re recent debtor document productions (.1);  | 0.10                | \$90.00              |
| 1/5/2024           | Karen Dempski            | Download/upload DEBTOR004 production documents (.5);  | 0.50                | \$170.00             |
| 1/7/2024           | Timothy Burns            | Review Committee coverage chart prepared by B. Cawley (.2);   | 0.20                | \$224.00             |
| 1/8/2024           | Jesse Bair               | Review correspondence with PSZJ re state court counsel meeting and potential insurance demands (.1);  | 0.10                | \$90.00              |
| 1/9/2024           | Jesse Bair               | Brief review re current version of the Committee's Rule 2004 subpoena on the Debtor (.1); review correspondence with A. Cain and the Debtor re same and Debtor discovery issues (.1);           | 0.20                | \$180.00             |
| 1/9/2024           | Jesse Bair               | Brief review re Debtor coverage chart prepared by B. Cawley (.1);   | 0.10                | \$90.00              |
| 1/9/2024           | Timothy Burns            | Review correspondence with the debtor and PSZJ re Rule 2004 subpoena (.1);  | 0.10                | \$112.00             |
| 1/15/2024          | Jesse Bair               | Review correspondence with B. Michael and state court counsel re upcoming state court counsel meeting (.1);   | 0.10                | \$90.00              |
| 1/15/2024          | Jesse Bair               | Review correspondence with PSZJ and the Debtor re discovery production issues and proposed weekly call re discovery issues (.1);  | 0.10                | \$90.00              |
| 1/17/2024          | Jesse Bair               | Review case protective order (.2); review and execute agreement to be bound by same (.1);   | 0.30                | \$270.00             |

|           |               |  |      |          |
|-----------|---------------|--|------|----------|
| 1/17/2024 | Jesse Bair    | Review and execute bar date confidentiality order (.1); correspond with B. Michael re same (.1);                 | 0.20 | \$180.00 |
| 1/18/2024 | Timothy Burns | Participate in call with state court counsel re case insurance strategy (.1);                                    | 0.10 | \$112.00 |
| 1/18/2024 | Jesse Bair    | Continued analysis re issues in connection with potential insurance demands and/or test cases (.1);              | 0.10 | \$90.00  |
| 1/19/2024 | Jesse Bair    | Correspondence with the Debtor re Debtor coverage chart (.1);  | 0.10 | \$90.00  |
| 1/19/2024 | Jesse Bair    | Review and respond to correspondence with state court counsel re insurance demand letter issues (.2);            | 0.20 | \$180.00 |
| 1/21/2024 | Jesse Bair    | Review fourth notice of continuance re certain insurers' motion to lift the stay (.1);                           | 0.10 | \$90.00  |
| 1/22/2024 | Jesse Bair    | Review correspondence with the Debtor re case discovery meeting (.1);  | 0.10 | \$90.00  |
| 1/23/2024 | Timothy Burns | Review correspondence with the Debtor and PSZJ re discovery meeting and current production status (.2);          | 0.20 | \$224.00 |
| 1/24/2024 | Brian Cawley  | Draft revised version of Committee coverage chart to incorporate suggested partner edits (.7);                   | 0.70 | \$385.00 |
| 1/24/2024 | Jesse Bair    | Analysis regarding the Debtor's insurance coverage program in connection with potential test cases (.4);         | 0.40 | \$360.00 |
| 1/24/2024 | Jesse Bair    | Draft email memorandum to state court counsel re potential test case issues (.2);                                | 0.20 | \$180.00 |
| 1/24/2024 | Jesse Bair    | Correspondence with B. Cawley re Debtor excess coverage in the 1980s (.1);                                       | 0.10 | \$90.00  |
| 1/25/2024 | Jesse Bair    | Review B. Michael correspondence re case update and discovery issues (.1);                                       | 0.10 | \$90.00  |
| 1/27/2024 | Timothy Burns | Review Debtor correspondence re document production issues (.1);   | 0.10 | \$112.00 |
| 1/27/2024 | Karen Dempksi | Download/upload recent Debtor document production (.4);  | 0.40 | \$136.00 |
| 1/28/2024 | Jesse Bair    | Analysis re the Westchester Excess policies (.1); correspondence with the Debtor re same (.1);                   | 0.20 | \$180.00 |
| 1/28/2024 | Jesse Bair    | Review correspondence from the debtor re recent document productions (.1);                                       | 0.10 | \$90.00  |
| 1/28/2024 | Jesse Bair    | Review the debtor's responses and objections to the Committee's stage one Rule 2004 examination (.2);            | 0.20 | \$180.00 |
| 1/30/2024 | Brian Cawley  | Compare draft Committee coverage chart with debtor's version and begin drafting summary of differences (1.7);    | 1.70 | \$935.00 |
| 1/30/2024 | Brian Cawley  | Analyze historical policy documentation to determine accuracy of current version of debtor coverage chart (1.0); | 1.00 | \$550.00 |

|   |               |   |              |                    |
|---|---------------|---|--------------|--------------------|
| 1/30/2024                                       | Jesse Bair    | Review the debtor's draft coverage chart (.1); correspondence with the Debtor re same and related secondary evidence (.1);              | 0.20         | \$180.00           |
| 1/30/2024                                       | Jesse Bair    | Review correspondence with the Diocese and PSZJ re case discovery issues (.1);  | 0.10         | \$90.00            |
| 1/30/2024                                       | Jesse Bair    | Correspondence with B. Cawley re analysis needed re discrepancies between the debtor and committee coverage charts (.1);                | 0.10         | \$90.00            |
| 1/31/2024                                       | Timothy Burns | Participate in call with J. Stang and B. Michael re ongoing insurance projects and strategy (.1); correspond with J. Bair re same (.1); | 0.20         | \$224.00           |
| 1/31/2024                                       | Timothy Burns | Review correspondence with PSZJ and debtor re document production matters (.1);   | 0.10         | \$112.00           |
| <b>Totals for Insurance Recovery Activities</b> |               |   | <b>10.10</b> | <b>\$7,770.00</b>  |
| <b>Total Hours and Fees</b>                     |               |   | <b>13.70</b> | <b>\$10,808.00</b> |

#### EXPENSES

| <u>Date</u>           | <u>Description</u>        | <u>Amount</u>  |
|-----------------------|---------------------------|----------------|
| 01/01/2024            | Fourth Quarter 2023 PACER | \$49.30        |
| <b>Total Expenses</b> |                           | <b>\$49.30</b> |

#### Timekeeper Summary

| <u>Name</u>         | <u>Title</u> | <u>Hours</u> | <u>Rate</u> | <u>Amount</u> |
|---------------------|--------------|--------------|-------------|---------------|
| Brenda Horn-Edwards | Paralegal    | 0.40         | \$340.00    | \$136.00      |
| Brian Cawley        | Associate    | 3.40         | \$550.00    | \$1,870.00    |
| Jesse Bair          | Partner      | 7.20         | \$900.00    | \$6,480.00    |
| Karen Dempski       | Paralegal    | 0.90         | \$340.00    | \$306.00      |
| Timothy Burns       | Partner      | 1.80         | \$1,120.00  | \$2,016.00    |

**Total Due This Invoice: \$10,857.30**